

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT, LAW DIVISION

SHARMIKA CUSIC,)
Plaintiff,)
vs.) No.
TARGET CORPORATION, Individually)
and d/b/a but not limited to,)
TARGET STORES and SUPER TARGET,)
Defendants.)

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CLERK OF THE CIRCUIT COURT
OF COOK COUNTY, IL

2015L009197
CALENDAR/ROOM F
TIME 00:00
Premises Liability

COMPLAINT

NOW COMES the Plaintiff, SHARMIKA CUSIC, by and through her attorneys, POPE & JABUREK, P.C., and complains of Defendants, TARGET CORPORATION, Individually and d/b/a but not limited to, TARGET STORES and SUPER TARGET, as follows:

1. On and prior to September 11, 2013, Defendants, TARGET CORPORATION, Individually and d/b/a but not limited to, TARGET STORES and SUPER TARGET, owned, operated, managed, maintained and controlled a certain store located in and about the Village of Bedford Park, County of Cook and State of Illinois, located at or about 7100 South Cicero, Bedford Park, Illinois.

2. In connection with the aforesaid store, Defendants maintained certain displays and stacks of Patio Furniture in the store at the above mentioned location in Bedford Park, Illinois.

3. Said stacks of Patio Furniture were intended for customers and it then and there became the duty of Defendants to maintain such stacks of patio furniture free from any undue obstacles, hazards and defective conditions.

4. On and prior to the day and date aforesaid, Defendants operating by and through its duly authorized agents and servants acting in its behalf maintained the aforesaid stacks of patio furniture within the store.

5. On or about the aforementioned date, Plaintiff, SHARMIKA CUSIC, was a customer in the aforesaid store.

6. At the aforesaid time and place, Plaintiff, SHARMIKA CUSIC, was caused to be injured due to stacked patio furniture falling off of the shelf in an aisle of the store and onto her.

7. On and prior to the day and date aforesaid, Defendants then and there carelessly and negligently did, or failed to do, one or more of the following acts:

- a. Failed to exercise reasonable care in the stacking and maintenance of said stacks of patio furniture;
- b. Defendant had actual and constructive notice of the aforesaid defective and unsafe condition of same, yet failed to correct same;
- c. Failed to warn persons such as Plaintiff of the dangerous conditions then and there existing;
- d. Failed to keep the stacks of patio furniture safe and stable.

8. By reason of the premises and as a proximate result of one or more, the other or all of the foregoing acts of misconduct on the part of Defendants, Plaintiff was caused to suffer diverse temporary and permanent disabling injuries to her head, body, mind, limbs and nervous system, by reason of which Plaintiff has expended and incurred obligations for medical expenses and care and will, in the future, expend and incur such further obligations; Plaintiff has been

and will be prevented from attending to her usual affairs and duties and has lost and will continue to lose great gains she would otherwise have made and acquired.

WHEREFORE, Plaintiff, SHARMIKA CUSIC, asks judgment against Defendants, TARGET CORPORATION, Individually and d/b/a but not limited to, TARGET STORES and SUPER TARGET, and each of them, in a sum in excess of the jurisdictional minimum for the County Department, Law Division of the Circuit Court of Cook County, plus costs of this action.

Donald W. Jaburek, Jr.

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